

LOWENSTEIN SANDLER LLP

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*Counsel to the Debtors and
Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

Duro Dyne National Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 18-27963 (MBK)

(Jointly Administered)

**SEVENTH MONTHLY FEE STATEMENT OF LOWENSTEIN SANDLER LLP
FOR THE PERIOD MAY 1, 2019 THROUGH MAY 31, 2019**

Lowenstein Sandler LLP, counsel to the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), submits this seventh monthly fee statement² for the period May 1, 2019 through May 31, 2019 (the “Seventh Fee Statement”) pursuant to the Court’s *Administrative Fee Order Establishing Certain Procedures for Allowance of Interim Compensation and Reimbursement of Expenses of Professionals Retained By Order of this Court*, dated December 18, 2018 [Docket No. 345] (the “Administrative Order”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s tax identification number, are: Duro Dyne National Corp. (4664); Duro Dyne Machinery Corp. (9699); Duro Dyne Corporation (3616); Duro Dyne West Corp. (5943); and Duro Dyne Midwest Corp. (4662).

² Lowenstein Sandler filed its *First Interim Application of Lowenstein Sandler LLP As Counsel To The Debtors For Compensation For Services Rendered And Reimbursement Of Expenses For The Period From September 7, 2018 Through November 30, 2018* [D.I. 353] in lieu of its first monthly fee statement.

Pursuant to the Administrative Order, responses to the Seventh Fee Statement, if any, are due by July 26, 2019.

Dated: July 16, 2019

Respectfully submitted,

LOWENSTEIN SANDLER LLP

/s/ Jeffrey D. Prol

Kenneth A. Rosen, Esq.

Jeffrey D. Prol, Esq.

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Counsel to the Debtors and Debtors-in-Possession

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

D.N.J. LBR 2016-1, FEE APPLICATION COVER SHEET

IN RE: Duro Dyne National Corp., et al.,¹

APPLICANT: Lowenstein Sandler LLP

CASE NO.: 18-27963 (MBK)

CLIENT: Chapter 11 Debtors

CHAPTER: 11

CASE FILED: September 7, 2018

COMPLETION AND SIGNING OF THIS FORM CONSTITUTES A CERTIFICATION UNDER
PENALTY OF PERJURY, PURSUANT TO 28 U.S.C. SECTION 1746

RETENTION ORDER(S) ATTACHED

**SEVENTH MONTHLY FEE STATEMENT OF LOWENSTEIN SANDLER LLP
FOR THE PERIOD MAY 1, 2019 THROUGH MAY 31, 2019**

**SECTION I
FEE SUMMARY**

	<u>FEES</u>	<u>EXPENSES</u>
TOTAL PREVIOUS FEES REQUESTED	<u>\$1,109,429.25</u>	<u>\$30,151.01</u>
TOTAL FEES ALLOWED TO DATE:	<u>\$1,021,980.75</u>	<u>\$29,510.23</u>
TOTAL RETAINER REMAINING	<u>\$ -0-</u>	<u>\$ -0-</u>
TOTAL HOLDBACK (IF APPLICABLE)	<u>\$17,489.70</u>	<u>\$ -0-</u>
TOTAL RECEIVED BY LOWENSTEIN SANDLER ²	<u>\$1,091,861.25</u>	<u>\$30,151.01</u>
FEE TOTALS	<u>\$76,172.25</u>	
DISBURSEMENTS TOTALS	<u>\$12,484.95</u>	
TOTAL FEE APPLICATION	<u>\$88,657.20</u>	
MINUS 20% HOLDBACK	<u>- 15,234.45</u>	
AMOUNT SOUGHT AT THIS TIME	<u>\$73,422.75</u>	

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number, are: Duro Dyne National Corp. (4664); Duro Dyne Machinery Corp. (9699); Duro Dyne Corporation (3616); Duro Dyne West Corp. (5943); and Duro Dyne Midwest Corp. (4662).

² Prior to the Petition Date, Lowenstein Sandler was retained to represent the Debtors in these Chapter 11 Cases. Lowenstein Sandler was paid for all amounts owed for legal services rendered prior to the Petition Date and was holding a retainer in the amount of \$117,300.04 (the "Retainer") for services and expenses incurred during these Chapter 11 Cases. The total amount received by Lowenstein Sandler reflects the application of the Retainer to amounts requested in Lowenstein Sandler's First Interim Fee Application [D.I. 353].

Name of Professional	Year Admitted	Title/Department	Hours Spent	Hourly Rate	Charge
Prol, Jeffrey D.	1989	Partner/Bankruptcy	57.10	\$895.00	\$51,104.50
*Prol, Jeffrey D. - Travel Time	1989	Partner/Bankruptcy	3.50	\$447.50	\$1,566.25
Freedman, Terri Jane	1991	Counsel/Bankruptcy	32.70	\$470.00	\$15,369.00
*Freedman, Terri Jane - Travel Time	1991	Counsel/Bankruptcy	5.10	\$235.00	\$1,198.50
Yusem, Stuart S.	1982	Counsel/Corporate / Tax	0.20	\$755.00	\$151.00
Kramer, Jeffrey A.	1995	Associate/Bankruptcy	1.30	\$470.00	\$611.00
Claussen, Diane	N/A	Paralegal/Bankruptcy	12.50	\$270.00	\$3,375.00
Jacome, Ruth	N/A	Paralegal/Bankruptcy	1.40	\$230.00	\$322.00
Lawler, Elizabeth B.	N/A	Paralegal/Bankruptcy	9.90	\$250.00	\$2,475.00
TOTAL FEES			123.70		\$76,172.25
Attorney Blended Rate				\$700.70	

SECTION II SUMMARY OF SERVICES

Task Description	Hours	Fees
Case Administration	3.20	\$980.00
Fee/Employment Applications	16.70	\$6,035.50
Employment and Retention Applications - Others	4.10	\$1,714.50
Fee Applications and Invoices - Others	8.70	\$2,892.50
Assumption/Rejection of Leases and Contracts	0.20	\$94.00
Non-Working Travel	8.60	\$2,764.75
Tax Issues	4.50	\$2,115.00
Claims Administration and Objections	16.00	\$13,257.50
Plan and Disclosure Statement (including Business Plan)	43.00	\$32,812.00
Court Hearings	8.00	\$5,392.50
Other - Insurance Matters	10.70	\$8,114.00
Total	123.70	\$76,172.25

SECTION III
SUMMARY OF DISBURSEMENTS

Outside Legal Counsel / Local Counsel	\$10,741.75
Computerized legal research	\$958.46
Telecommunications	\$268.46
Transcript charges	\$242.00
Travel	\$274.28
Total Disbursements	\$12,484.95

SECTION IV CASE HISTORY

(NOTE: Items 3 - 6 are not applicable to applications under 11 U.S.C. §506)

- (1) DATE CASE FILED: September 7, 2018
- (2) CHAPTER UNDER WHICH CASE WAS COMMENCED: 11
- (3) DATE OF RETENTION: October 19, 2018, effective as of September 7, 2018 [Docket No. 194]. See Order attached.
- (4) SUMMARIZE IN BRIEF THE BENEFITS TO THE ESTATE AND ATTACH SUPPLEMENTS AS NEEDED:
 - a) Lowenstein Sandler attended to confirmation issues, including (i) drafting and filing proposed findings of fact and conclusions of law regarding confirmation of the plan; (ii) preparing a reply to the findings of fact and conclusions of law regarding confirmation of the plan; (iii) preparing for and attending hearing on confirmation of the plan and (iv) working on plan implementation;
 - b) Lowenstein Sandler attended to mediation issues with respect to North River claims;
 - c) Lowenstein Sandler attended to insurance issues, including preparing and filing a reply to North River's objection to insurance settlements, and preparing for and attending a hearing on approval of insurance settlements;
 - d) Lowenstein Sandler attended to drafting the Debtors' third motion to extend time to assume or reject leases;
 - e) Lowenstein Sandler prepared and filed monthly and interim fee applications for itself and the Debtors' other professionals; and
 - f) Lowenstein Sandler performed all other legal services for the Debtors that were necessary and proper in these proceedings and in furtherance of the Debtors' needs.

(5) ANTICIPATED DISTRIBUTION TO CREDITORS:

- (A) ADMINISTRATION EXPENSES: (100%)
- (B) SECURED CREDITORS: (100%)
- (C) PRIORITY CREDITORS: (100%)
- (D) GENERAL UNSECURED CREDITORS: (100%)

(6) FINAL DISPOSITION OF CASE AND PERCENTAGE OF DIVIDEND PAID TO CREDITORS (IF APPLICABLE): Final disposition of case and dividend are unknown at this time.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: July 16, 2019

/s/ Jeffrey D. Prol
Jeffrey D. Prol Esq.



UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1

LOWENSTEIN SANDLER LLP

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*Proposed Counsel to the Debtors and
Debtors-in-Possession*

Order Filed on October 19, 2018
by Clerk
U.S. Bankruptcy Court
District of New Jersey

In re:

Duro Dyne National Corp., *et al.*¹
Debtors.

Chapter 11

Case No. 18-27963 (MBK)
(Jointly Administered)

**ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF
LOWENSTEIN SANDLER LLP AS COUNSEL TO THE DEBTORS
EFFECTIVE AS OF THE PETITION DATE**

The relief set forth on the following pages, numbered two (2) through three (3), is hereby **ORDERED**.

DATED: October 19, 2018

A handwritten signature in black ink, appearing to read "Michael B. Kaplan".
Honorable Michael B. Kaplan
United States Bankruptcy Judge

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Debtors: Duro Dyne National Corp., *et al.*

Case No.: 18-27963 (MBK)

Caption: Order Authorizing the Employment and Retention of Lowenstein Sandler LLP as Counsel to the Debtors Effective as of the Petition Date

Upon consideration of the application (the “Application”)² of the above captioned debtors and debtors-in-possession (collectively, the “Debtors”) for entry of an order authorizing the employment and retention of Lowenstein Sandler LLP (“Lowenstein Sandler”) as counsel to the Debtors, effective as of the Petition Date (September 7, 2018), and upon consideration of the Prol Declaration submitted in support of the Application; and the Court being satisfied, based on representations made in the Application that (i) Lowenstein Sandler has no connection with the Debtors, their creditors, any other party in interest, their current respective attorneys or professionals, the United States Trustee or any person employed in the office of the United States Trustee, and does not represent any entity having an adverse interest to the Debtors in connection with the Debtors’ Chapter 11 Cases, except as set forth in the Prol Declaration; (ii) Lowenstein Sandler is a “disinterested person” as that phrase is defined in section 101(14) of the Bankruptcy Code, (iii) neither Lowenstein Sandler, nor its professionals, have any connection with the Debtors, their creditors or any other party in interest; and (iv) Lowenstein Sandler’s employment is necessary and in the best interest of the Debtors; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Standing Order of Reference to the Bankruptcy Court Under Title 11* of the United States District Court for the District of New Jersey dated September 18, 2012 (Simandle, C.J.); and venue being proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and notice of the Application being sufficient under the circumstances; and it appearing that no other or further notice need be provided; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Application is **GRANTED** as set forth herein.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application.

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Debtors: Duro Dyne National Corp., *et al.*

Case No.: 18-27963 (MBK)

Caption: Order Authorizing the Employment and Retention of Lowenstein Sandler LLP as Counsel to the Debtors Effective as of the Petition Date

2. The Debtors are authorized to employ and to retain Lowenstein Sandler, effective as of the Petition Date, to serve as the Debtors' counsel in these Chapter 11 Cases.

3. Lowenstein Sandler shall be compensated in accordance with sections 330 and 331 of the Bankruptcy Code, the applicable provisions of the Bankruptcy Rules, the Local Rules, and any orders entered in this case governing professional compensation and reimbursement for services rendered and charges and disbursements incurred.

4. The requirement set forth in Local Rule 9013-1(a)(3) that any motion or other request for relief be accompanied by a memorandum of law is hereby deemed satisfied by the contents of the Application or otherwise waived.

5. The Debtors are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order.

6. This Court shall retain exclusive jurisdiction to hear and decide any and all disputes related to or arising from the implementation, interpretation and enforcement of this Order.

EXHIBIT A

EXHIBIT A

Professional Services rendered by Lowenstein Sandler LLP, through May 31, 2019

In re: Chapter 11

I. SUMMARY OF TIME CHARGES AND HOURLY RATES

Name of Professional	Year Admitted	Title/Department	Hours Spent	Hourly Rate	Charge
Prol, Jeffrey D.	1989	Partner/Bankruptcy	57.10	\$895.00	\$51,104.50
*Prol, Jeffrey D. - Travel Time	1989	Partner/Bankruptcy	3.50	\$447.50	\$1,566.25
Freedman, Terri Jane	1991	Counsel/Bankruptcy	32.70	\$470.00	\$15,369.00
*Freedman, Terri Jane - Travel Time	1991	Counsel/Bankruptcy	5.10	\$235.00	\$1,198.50
Yusem, Stuart S.	1982	Counsel/Corporate / Tax	0.20	\$755.00	\$151.00
Kramer, Jeffrey A.	1995	Associate/Bankruptcy	1.30	\$470.00	\$611.00
Claussen, Diane	N/A	Paralegal/Bankruptcy	12.50	\$270.00	\$3,375.00
Jacome, Ruth	N/A	Paralegal/Bankruptcy	1.40	\$230.00	\$322.00
Lawler, Elizabeth B.	N/A	Paralegal/Bankruptcy	9.90	\$250.00	\$2,475.00
TOTAL FEES			123.70		\$76,172.25
Attorney Blended Rate					\$700.70

* Reflects 50% rate reduction due to non-working travel time

TIME DETAIL:

Code	Date	Timekeeper	Time Narrative	Hours	Amount
<u>B100 - Administration</u>					
<u>B110 Case Administration</u>					
B110	05/06/19	RJ	Tend to filing Affidavit of Service for BMC Group	0.30	\$69.00
B110	05/09/19	DC	Review docket and update electronic files	0.20	\$54.00
B110	05/16/19	DC	Tend to filing BMC Affidavit of Service for Plan Proponents' Reply Brief (.10); and update critical dates memo (.30)	0.40	\$108.00
B110	05/21/19	TJF	Review and approve April MORs	0.30	\$141.00
B110	05/22/19	RJ	Tend to filing Certificate of Service for BMC Group	0.30	\$69.00
B110	05/23/19	DC	Tend to filing and service of Monthly Operating Report for April 2019	0.20	\$54.00
B110	05/23/19	TJF	Review and approve April MOR and GH April fee app	0.40	\$188.00
B110	05/24/19	DC	Tend to filing Affidavits of Service from BMC Group	0.20	\$54.00
B110	05/29/19	DC	Tend to filing Affidavit of Service for BMC Group	0.10	\$27.00
B110	05/30/19	DC	Review docket, update critical dates memo and attorney calendar (.60) and tend to filing Affidavit of Service from BMC for monthly invoice (.20)	0.80	\$216.00
Total B110 - Case Administration				3.20	\$980.00

B160 Fee/Employment Applications

B160	05/02/19	TJF	Tend to multiple fee applications, orders and CNOs for Debtors' professionals (.3); review e-mail from J. Prol re: same (.1)	0.40	\$188.00
B160	05/03/19	TJF	Review e-mail from B. Lawler re: Second Interim Fee Apps	0.10	\$47.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B160	05/07/19	TJF	Confer with E. Lawler re: monthly fee applications (.3); confer with J. Prol re: same (.3); review and revise e-mail to counsel re: same (.3); review of February and March fees applications (1.6)	2.50	\$1,175.00
B160	05/08/19	TJF	Review and approve e-mail by paralegal to client re: fee applications	0.10	\$47.00
B160	05/14/19	EBL	Prepare LS fifth monthly fee statement	0.90	\$225.00
B160	05/14/19	EBL	Finalize, e-file and coordinate service of LS Fifth Monthly fee statement; e-mail to client re: same	0.70	\$175.00
B160	05/14/19	JDP	Final review of March invoice	0.20	\$179.00
B160	05/14/19	JDP	Review LS' March and April pre-bills	0.50	\$447.50
B160	05/14/19	TJF	Confer with paralegal re: preparation of second interim fee application (.3); review and approve CNO for GH (.3)	0.60	\$282.00
B160	05/15/19	DC	Prepare second interim fee application of Lowenstein Sandler with related certification and order	3.10	\$837.00
B160	05/15/19	TJF	Initial review of Lowenstein Sandler's second fee application	0.40	\$188.00
B160	05/16/19	DC	Finalize Lowenstein Sandler's Second Interim Fee Application	2.60	\$702.00
B160	05/16/19	EBL	Review and respond to e-mail from D. Claussen re: questions regarding preparation of second interim fee application	0.20	\$50.00
B160	05/16/19	JDP	Review LS' April fee statement	0.20	\$179.00
B160	05/16/19	TJF	Review fee statements from the legal representative	0.10	\$47.00
B160	05/17/19	EBL	Prepare Lowenstein Sandler's Sixth Monthly Fee Application and related documents	1.40	\$350.00
B160	05/17/19	TJF	Review and approve Getzler Henrich Second Interim Fee Application and Lowenstein sixth monthly fee application	0.40	\$188.00
B160	05/21/19	DC	Revise, finalize and file second interim fee application of Lowenstein Sandler	1.10	\$297.00
B160	05/21/19	TJF	Review and approve GH fee application for filing; revise LS fee application	0.40	\$188.00
B160	05/24/19	EBL	Finalize, e-file and coordinate service of Lowenstein Sandler's sixth monthly fee statement	0.60	\$150.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B160	05/24/19	TJF	Review and approve LS 6th monthly fee application	0.20	\$94.00
Total B160 - Fee/Employment Applications				16.70	\$6,035.50
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B165 Employment and Retention Applications - Others

B165	05/14/19	JDP	Review letter to District Court re: Imreys decision on appointment of futures rep	0.30	\$268.50
B165	05/14/19	TJF	Review draft letter to submit the Imerys ruling as supplemental authority in the Duro Dyne appeal; revise same and tend to filing	1.20	\$564.00
B165	05/15/19	DC	Tend to filing letter to US District Court Clerk re: Imerys	0.20	\$54.00
B165	05/15/19	TJF	Tend to filing copy of Imerys case law	0.30	\$141.00
B165	05/21/19	DC	Review, revise, format and file second interim fee application of Getzler Henrich	1.50	\$405.00
B165	05/21/19	TJF	Review letter of supplemental authority filed by Trustee	0.30	\$141.00
B165	05/22/19	TJF	Review ordinary course professional orders and Anderson Kill fee application	0.30	\$141.00

Total B165 - Employment and Retention Applications - Others	4.10	\$1,714.50
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B175 Fee Applications and Invoices - Others

B175	05/01/19	TJF	E-mail exchange with C. Malone and C. O'Callaghan re: Anderson Kill's invoice for time worked from December 2018 through March 31, 2019	0.40	\$188.00
B175	05/01/19	TJF	Tend to e-mails re: Getzler Henrich & Associates March fee application	0.20	\$94.00
B175	05/06/19	EBL	Review and chart all fee apps filed by all professionals to date, with CNO and Order dates	2.30	\$575.00
B175	05/07/19	EBL	Prepare comprehensive e-mail to T. Freedman re: incorrectly filed fee applications filed by other professionals	0.90	\$225.00
B175	05/14/19	DC	Revise Imerys letter to District Court Clerk re: UST v. Duro Dyne and tend to filing same	0.40	\$108.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B175	05/14/19	EBL	Finalize and e-file Getzler CNO to fifth monthly fee statement; e-mail to client re: same; review docket re: second interim fee applications filed thus far	0.50	\$125.00
B175	05/14/19	EBL	Prepare CNO to Getzler's fifth monthly fee statement	0.20	\$50.00
B175	05/16/19	EBL	Finalize, efile and coordinate service of Anderson Kill's second monthly fee statement	0.60	\$150.00
B175	05/16/19	JDP	Review fee applications of legal representative and counsel; forward to C. O'Callahan	0.20	\$179.00
B175	05/16/19	JDP	Review Anderson Kill fee statement	0.20	\$179.00
B175	05/16/19	JDP	Review fee statements of legal rep and counsel; forward to client	0.30	\$268.50
B175	05/20/19	RJ	Tend to filing of Affidavit of Service re: Second Fee Statement	0.30	\$69.00
B175	05/21/19	EBL	Review Getzler April Fee Statement; e-mail to T. Freedman and J. Prol re: permission to file	0.20	\$50.00
B175	05/23/19	EBL	Revise, finalize, e-file and coordinate service of Getzler's sixth monthly fee statement	0.70	\$175.00
B175	05/28/19	TJF	Review CNO to Anderson Kill's Second Monthly Fee Statement	0.10	\$47.00
B175	05/29/19	EBL	Finalize and file cno for Anderson Kill second monthly fee statement	0.20	\$50.00
B175	05/29/19	EBL	Review docket for objections; prepare cno re: Anderson Kill's second monthly fee statement	0.30	\$75.00
B175	05/30/19	EBL	Prepare e-mail to debtors re: payment due to Anderson Kill re: second monthly fee statement	0.20	\$50.00
B175	05/30/19	TJF	Review and approve CNO for Anderson Kill's April 2019 fee	0.10	\$47.00
B175	05/30/19	TJF	Review and approve Getzler Henrich CNO for second fee application	0.10	\$47.00
B175	05/31/19	TJF	Review e-mail from J. Sponder re: Mazars fee application; call to T. Funkhouser re: same	0.30	\$141.00
Total B175 - Fee Applications and Invoices - Others				8.70	\$2,892.50

B185 Assumption/Rejection of Leases and Contracts

B185	05/30/19	TJF	Drafting third motion to extend time to assume or reject leases	0.20	\$94.00
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ALL DETAILED INFORMATION IS CONSIDERED TO BE PRIVILEGED AND CONFIDENTIAL.

Code	Date	Timekeeper	Time Narrative	Hours	Amount
Total B185 - Assumption/Rejection of Leases and Contracts					
				0.20	\$94.00
<u>B195 Non-Working Travel</u>					
B195	05/22/19	JDP	Travel to and from court for hearing on confirmation	3.50	\$1,566.25
B195	05/22/19	TJF	Travel to and attend hearing on confirmation decision; continuing discussions with counsel and clients regarding same; tend to obtaining transcript	5.10	\$1,198.50
Total B195 - Non-Working Travel					
				8.60	\$2,764.75
<u>B200 - Operations</u>					
<u>B240 Tax Issues</u>					
B240	05/07/19	TJF	Review tax documents and related e-mails re: payment of outstanding taxes and filing of returns taxes(.5); telephone call with C. O'Callaghan re: same(.2); draft letter to Mrs. Hunter at the IRS re: same(.5)	2.20	\$1,034.00
B240	05/10/19	TJF	Draft letter to IRS re: tax issues	1.00	\$470.00
B240	05/21/19	TJF	Call to Mrs Hunter; finalize letter to IRS; forward same to J. Prol for approval	1.30	\$611.00
Total B240 - Tax Issues					
				4.50	\$2,115.00
<u>B300 - Claims and Plan</u>					
<u>B310 Claims Administration and Objections</u>					
B310	05/06/19	JDP	E-mails to/from C. Malone and K. Quinn re: mediation with N. River	0.30	\$268.50
B310	05/08/19	TJF	Review e-mails re: mediation strategy	0.20	\$94.00
B310	05/09/19	JDP	Review and edit mediation statement for N. River mediation	2.00	\$1,790.00
B310	05/09/19	JDP	E-mails to/from client re: mediation strategy	0.20	\$179.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B310	05/09/19	TJF	Tend to e-mails re: brief in response to North River's Objections to Insurance Settlements	0.30	\$141.00
B310	05/09/19	TJF	Review draft Duro Dyne confidential mediation brief	0.50	\$235.00
B310	05/10/19	JDP	Review and edit revised version of mediation statement	1.00	\$895.00
B310	05/10/19	TJF	Review final Duro Dyne mediation statement and exhibits	0.60	\$282.00
B310	05/13/19	TJF	Review e-mails re: mediation with North River	0.20	\$94.00
B310	05/14/19	JDP	Prepare for and participate in call with client to prepare for mediation	1.20	\$1,074.00
B310	05/16/19	JDP	Participate in pre-call with mediator to prepare for mediation with N. River	0.80	\$716.00
B310	05/17/19	JDP	Attend mediation with N. River	7.50	\$6,712.50
B310	05/22/19	JDP	Telephone conference with C. Malone re: follow up on mediation with N. River	0.20	\$179.00
B310	05/24/19	JDP	Review and edit letter to T. Gallagher re: all sums method of allocation	0.30	\$268.50
B310	05/24/19	TJF	E-mail exchange re: New York state court action	0.20	\$94.00
B310	05/29/19	TJF	E-mail exchange with C. Malone re: New York action adjournment sought	0.10	\$47.00
B310	05/31/19	TJF	E-mail exchange with C. Malone and client re: North River does not consent to pushing off the pending insurance case motions	0.20	\$94.00
B310	05/31/19	TJF	Review letter from North River objecting to adjournment	0.20	\$94.00
Total B310 - Claims Administration and Objections				16.00	\$13,257.50

B320 Plan and Disclosure Statement (including Business Plan)

B320	05/01/19	JDP	Review and edit response to UST findings of fact and conclusions of law	2.00	\$1,790.00
B320	05/01/19	JDP	Review and respond to e-mails re: BAML commitment	0.20	\$179.00
B320	05/01/19	JDP	Review and edit reply to findings of fact/conclusions of law	5.00	\$4,475.00

ALL DETAILED INFORMATION IS CONSIDERED TO BE PRIVILEGED AND CONFIDENTIAL.

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	05/01/19	TJF	Draft/review reply brief to objectors' proposed findings and conclusions; review comments to brief	2.30	\$1,081.00
B320	05/01/19	TJF	Review and respond e-mails from S. Yusem and C. O'Callaghan regarding commitment letter from BOA	0.20	\$94.00
B320	05/02/19	JDP	Review and edit reply to findings of fact/conclusions of law	7.00	\$6,265.00
B320	05/02/19	TJF	Review current draft of reply brief and send comments to J. Leisemer; review comments from S. Kohut	1.30	\$611.00
B320	05/03/19	JDP	Review revised tdp	0.30	\$268.50
B320	05/03/19	JDP	Prepare certification for filing of revised tdp	0.20	\$179.00
B320	05/03/19	JDP	Final review and edits to reply to findings of fact/conclusions of law	2.50	\$2,237.50
B320	05/03/19	RJ	Tend to filing Brief in Opposition to Proposed FOF - COL of Plan Objection	0.50	\$115.00
B320	05/03/19	TJF	Review revised version of the TDP	0.30	\$141.00
B320	05/03/19	TJF	Review final version of Brief in Response to Objectors' Proposed Findings and Conclusions and tend to filing	0.80	\$376.00
B320	05/03/19	TJF	Review the United States Trustee and North River's Responses to Debtors' FOF/COL	1.20	\$564.00
B320	05/06/19	JDP	Review North River reply to findings of fact/conclusions of law	1.30	\$1,163.50
B320	05/13/19	JDP	Review e-mail from court re: 5/22 hearing; draft update to client	0.30	\$268.50
B320	05/13/19	TJF	Review e-mail from Rebecca Earl re: Court to issue ruling and responses from client	0.30	\$141.00
B320	05/14/19	SSY	Confer with J. Prol re: open intercreditor issues	0.20	\$151.00
B320	05/15/19	JDP	Follow-up with committee and legal rep re: comments on BAML intercreditor agreement	0.20	\$179.00
B320	05/20/19	JAK	Telephone conference with J. Prol re: telephonic hearing	0.20	\$94.00
B320	05/20/19	TJF	Tend to conference call with Court re: revisions to plan	0.10	\$47.00
B320	05/21/19	JDP	Prepare for hearing on confirmation and on approval of insurance settlements	2.00	\$1,790.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	05/22/19	JAK	Prepare for telephonic hearing on confirmation and settlement	0.40	\$188.00
B320	05/22/19	JDP	Telephone conference with J. Wehner re: confirmation decision	0.20	\$179.00
B320	05/22/19	JDP	Telephone conference with R. Hinden re: confirmation decision	0.10	\$89.50
B320	05/24/19	JDP	E-mail exchange with A. Wein re: status of confirmation of Plan	0.20	\$179.00
B320	05/24/19	JDP	Review transcript of Court's decision on plan confirmation	1.00	\$895.00
B320	05/28/19	JDP	Analyze Judge Kaplan ruling on confirmation; review trust agreement and tdp re: amendments required by the decision	1.20	\$1,074.00
B320	05/28/19	TJF	Tend to call with clients (.3); review and respond to e-mails from A. Wein and C. Malone re: discussion with Hartford (.2)	0.50	\$235.00
B320	05/29/19	JDP	Draft e-mail to client re: status of discussions on amendments to plan required by Judge Kaplan	0.20	\$179.00
B320	05/29/19	JDP	Review confirmation decision and analyze changes to trust agreement and tdp required by Judge Kaplan	2.50	\$2,237.50
B320	05/29/19	JDP	Telephone conference with M. Hausman re: confirmation ruling	0.20	\$179.00
B320	05/29/19	JDP	Prepare for implementation of plan	0.40	\$358.00
B320	05/29/19	TJF	Research re: asbestos trust standards	2.30	\$1,081.00
B320	05/30/19	JDP	Telephone conference with client to update re: status of plan proponents decision on amendments to plan and tdp	0.80	\$716.00
B320	05/30/19	JDP	Participate in call with Plan Proponents re: review of Court's decision on confirmation and amendments to trust agreement and tdp	0.60	\$537.00
B320	05/30/19	TJF	Telephone call with clients re: discuss status of case	0.80	\$376.00
B320	05/30/19	TJF	Telephone call with counsel re: confirmation decision	0.60	\$282.00
B320	05/31/19	JDP	Telephone conference with court to report on status of review of confirmation decision and edits to trust agreement and tdp	0.20	\$179.00
B320	05/31/19	JDP	Continued review of confirmation decision and work on implementation	1.20	\$1,074.00

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B320	05/31/19	TJF	Research re: standard of review for trusts(1.0); confer with J. Prol re: same (.2)	1.20	\$564.00
Total B320 - Plan and Disclosure Statement (including Business Plan)				43.00	\$32,812.00

B400 - Bankruptcy-Related Advice

B430A Court Hearings

B430A	05/13/19	JDP	Prepare for hearing on confirmation and insurance settlement motions	2.50	\$2,237.50
B430A	05/16/19	DC	Review hearing calendar for 5/22/19, update attorney calendar and follow up re: hearing agenda and binders	0.30	\$81.00
B430A	05/16/19	TJF	E-mails re: continued confirmation hearing	0.20	\$94.00
B430A	05/16/19	TJF	Review e-mail re: agenda for confirmation decision hearing	0.10	\$47.00
B430A	05/22/19	DC	Draft e-mail to J&J requesting expedited transcript for 5/22/19 hearing and prepare documents for T. Freedman re: revised Trust Distribution Procedures	0.40	\$108.00
B430A	05/22/19	JAK	Participate in telephonic hearing on confirmation and settlement	0.70	\$329.00
B430A	05/22/19	JDP	Attend hearing on confirmation; confer with N. River and legal rep's counsel following hearing	2.00	\$1,790.00
B430A	05/28/19	TJF	Review and approve draft agenda for June 3 motions	0.20	\$94.00
B430A	05/29/19	TJF	E-mail discussion with clients re: update on confirmation decision	0.20	\$94.00
B430A	05/30/19	DC	Prepare Notice of Agenda for 6/3/19 hearing and tend to filing and service of same	0.70	\$189.00
B430A	05/31/19	TJF	Prep for and participate on call re: confirmation decision	0.50	\$235.00
B430A	05/31/19	TJF	E-mail exchange with paralegal re: agenda for hearings on June 3	0.20	\$94.00

Total B430A - Court Hearings **8.00** **\$5,392.50**

B460 Other - Insurance Matters

Code	Date	Timekeeper	Time Narrative	Hours	Amount
B460	05/01/19	TJF	Review Midstates' Reply to North River Insurance Company's Objection to Motions for the Sale of Insurance Policies	0.30	\$141.00
B460	05/02/19	TJF	Review reply to objection to Motion to sell insurance policies	0.40	\$188.00
B460	05/07/19	TJF	Review Response to Motion for Sale of Insurance Policies filed by Hartford	0.30	\$141.00
B460	05/08/19	JDP	Review objection to approval of insurance motion; develop response	1.50	\$1,342.50
B460	05/09/19	TJF	Review e-mails re: strategy for response to North River's settlement objections	0.20	\$94.00
B460	05/10/19	JDP	Review and revise reply to N. River objection to insurance settlements	1.20	\$1,074.00
B460	05/11/19	JDP	Review and edit reply to N. River's objection to insurance settlements	1.50	\$1,342.50
B460	05/13/19	JDP	Review and edit reply in support of insurance settlement motions	1.50	\$1,342.50
B460	05/13/19	TJF	Review draft reply brief to North River's objections to insurer settlements and comments to same	1.00	\$470.00
B460	05/14/19	TJF	Review final version of reply brief to North River's settlement objections	0.50	\$235.00
B460	05/14/19	TJF	Tend to filing reply to North River's Objections to Insurance Settlements	0.30	\$141.00
B460	05/15/19	DC	Tend to filing and service of Plan Proponents' Reply Brief in Support of Insurance Settlements	0.30	\$81.00
B460	05/15/19	JDP	Final review and edits to reply in support of insurance settlement motions	1.30	\$1,163.50
B460	05/30/19	JDP	Follow up with C. Malone re: status of mediation with N. River	0.10	\$89.50
B460	05/30/19	JDP	E-mails from/to and telephone conference with C. Malone re: adjournment of NY coverage action	0.30	\$268.50

Total B460 - Other - Insurance Matters 10.70 \$8,114.00

Timekeeper Summary (by Task):

Task	Task Description	Hours	Fees
B110	Case Administration	3.20	\$980.00
B160	Fee/Employment Applications	16.70	\$6,035.50
B165	Employment and Retention Applications - Others	4.10	\$1,714.50
B175	Fee Applications and Invoices - Others	8.70	\$2,892.50
B185	Assumption/Rejection of Leases and Contracts	0.20	\$94.00
B195	Non-Working Travel	8.60	\$2,764.75
B240	Tax Issues	4.50	\$2,115.00
B310	Claims Administration and Objections	16.00	\$13,257.50
B320	Plan and Disclosure Statement (including Business Plan)	43.00	\$32,812.00
B430A	Court Hearings	8.00	\$5,392.50
B460	Other - Insurance Matters	10.70	\$8,114.00
	Total	123.70	\$76,172.25

EXHIBIT B

EXHIBIT B

Actual and necessary disbursements incurred by Lowenstein Sandler LLP

II. Summary of Disbursement Charges

Outside Legal Counsel / Local Counsel	\$10,741.75
Computerized legal research	\$958.46
Telecommunications	\$268.46
Transcript charges	\$242.00
Travel	<u>\$274.28</u>
Total Disbursements	<u>\$12,484.95</u>

The above charges are based upon time and expense records available on or about the date of the attached letter. Such records are believed in good faith to be accurate and substantially up to date, but there may be fees and expenses that have not been processed as of such date which Lowenstein Sandler LLP may submit in the future. Lowenstein Sandler LLP reserves the right to amend this monthly statement at a later date.

DISBURSEMENT DETAIL:

<u>Date</u>	<u>Description</u>	<u>Amount</u>
06/26/19	Outside Legal Counsel / Local Counsel VENDOR: The Gallagher Law Group PC; INVOICE#: 19-1210-05; DATE: 6/26/2019 Professional Services	\$10,741.75
05/12/19	Other Telecommunications Charges VENDOR: Prol, Jeffrey D. INVOICE#: 3377003706140202 DATE: 6/14/2019 ; 05/12/19; Telecom - Other; May 2019 Cell Phone Bill	\$161.84
05/22/19	Other Telecommunications Charges VENDOR: American Express INVOICE#: 3392261206210204 DATE: 6/21/2019 ; 05/22/19; Misc - Other; Telephonic court appearance	\$53.31
05/22/19	Other Telecommunications Charges VENDOR: American Express INVOICE#: 3392261206210204 DATE: 6/21/2019 ; 05/22/19; Misc - Other; Telephonic court appearance	\$53.31
05/22/19	Transcript Charges VENDOR: J & J Court Transcribers Inc.; INVOICE#: 2019-00987; DATE: 5/23/2019 - Transcript of 5/22/19 court proceedings	\$242.00
05/17/19	Travel - Accommodations VENDOR: Prol, Jeffrey D. INVOICE#: 3365147506030200 DATE: 6/3/2019 ; 05/17/19; Hotel - Lodging; Hotel to stay in NYC during NCCA Quarterly Mtg in NY office & Duro Dyne Meeting	\$274.28
05/29/19	Computerized legal research: Lexis: User: FREEDMAN, TERRI; Service: LEXIS ADVANCE; Charge Type: ACCESS CHARGE-11; DOC ACCESS-15; ; Total Disbursements	\$958.46
		<hr/> \$12,484.95